

IDD 6888

5B-C

10/18/13



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OCT 18 2013

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply to: OCE-127

Certified Mail Number 7012 1010 0003 2872 5768

Return Receipt Requested

J. Wayne Maxie, R.G.
Manager, Environmental Projects
Agrium US, Inc.
4582 S Ulster Street Suite 1700
Denver, CO 80237-2641

Re: Approval of Monitoring Well Screen Interval for Well Location A-58
Administrative Order on Consent for Nu-West Industries, Inc.
Idaho Facility, Docket No. RCRA-10-2009-0186

FILE COPY

Dear Mr. Maxie:

This letter provides approval of the monitoring well screen interval for well location A-58, as discussed with your contractor WSP on October 18, 2013. The approved screen interval is as follows:

A-58 First monitoring well screened at 90 to 105 feet below ground surface

The rationale for recommending this interval, as presented by WSP, was geology, water quality contaminants of concern (COCs) and hydraulics. The basis for the recommendation of this screen interval was that it is within a competent basalt flow interior where a discrete fracture within the interval is conducting the highest groundwater concentration for orthophosphate (2,442 mg/l) and the lowest pH (3.59). The fluoride concentration was also elevated, but it was not the highest within this portion of the borehole. Past selections of screen intervals at other borehole locations were within the vesicular basalts with high groundwater COCs concentration and a good groundwater yield. It should be noted that high groundwater COCs concentrations were found from 58 to 118 feet below ground surface (bgs) within this borehole.

EPA recommends that a second monitoring well be included near this borehole location with a well screen interval from 65 to 75 bgs. The rationale for this additional well is as follows:

- The highest fluoride concentrations (>300 mg/l) were found at a 68 to 78 feet bgs depth.
- The pH of the groundwater was less than 4.
- Orthophosphate was found at concentrations ranging from 1,800 to 2,000 mg/l.

This ten foot screen interval would be located with the vesicular basalt at this depth. Having these two monitoring wells will also provide information on the vertical gradient and may help determine the role of the fractured basalt on the fate of the COCs or determine the source(s) of these elevated concentrations from either a downward vertical direction or a lateral up-gradient direction. These

fractures were indentified in the borehole summary for A-58 in all three pages of the handout - cased borehole log (page 3), driller notes fracture at 60' bgs (page 1), and proposed screen intervals (page 2).

Bernie Zavala and I are available to discuss this further with you upon your return to the office. Thank you for your attention to this important matter. ~~MS~~ 8 1 100

Sincerely,



Peter Magolske
Air and RCRA Compliance Unit

cc: Brian Monson, Idaho Department of Environmental Quality
P. Scott Burton, Esq. Hunton and Williams LLP
Timothy J. Carlstedt, Esq. Hunton and Williams LLP

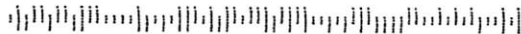
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US EPA
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J. Wayne Maxie, P.G.
Manager, Environmental Projects
Agrium US, Inc.
4582 S. Ulster Street, Suite 1700
Denver, CO 80237

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